

EXHIBIT 256

UNDER PROTECTIVE ORDER

Page 1

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

THE STATE OF TEXAS, et al.,
Plaintiffs,

Civil Action No.

vs.

4:20-cv-00957-SJD

GOOGLE, LLC,

Defendant.

_____ /

May 1, 2024

9:03 a.m. - 12:31 p.m. MDT

VIDEOTAPED DEPOSITION OF ANNA SCHNEIDER
TAKEN VIA ZOOM TELECONFERENCE

Taken on behalf of the Defendant before
Alice J. Teslicko, Registered Merit Reporter, and
Notary Public in and for the State of Florida at
Large, pursuant to a Notice of Taking 30(b)(6)
Deposition in the above cause.

Job No. CS6659471

UNDER PROTECTIVE ORDER

Page 2

1 APPEARANCES VIA TELECONFERENCE:

2 On Behalf of the Plaintiff States:

3 COOPER & KIRK, PLLC (MT)

BY: BRIAN W. BARNES, ESQ.

4 HAROLD S. REEVES, ESQ.

1523 New Hampshire Avenue, N.W.

5 Washington, DC 20036

(202) 220-9600

6 bbarnes@cooperkirk.com

hreeves@cooperkirk.com

7 LANIER LAW FIRM (TX/NY)

8 BY: RYAN ELLIS, ESQ.

9 ALEX HENTHORN, ESQ.

10 10940 West Sam Houston Parkway North

Houston, TX 77064

(713) 659-5200

11 ryan.ellis@lanierlawfirm.com

alex.henthorn@lanierlawfirm.com

12 SOUTH CAROLINA ATTORNEY GENERAL'S OFFICE

13 BY: REBECCA M. HARTNER, ESQ.

14 CLARK C. KIRKLAND JR., ESQ.

1000 Assembly Street

15 Columbia, SC 29201

(803) 734-3970

16 rhartner@scag.gov

ckirkland@scag.gov

17 On Behalf of the Defendant Google, LLC:

18 FRESHFIELDS BRUCKHAUS DERINGER, LLP

19 BY: XIAOXI TU, ESQ.

20 ELIZABETH CURRAN, ESQ.

Three World Trade Center

21 175 Greenwich Street

New York, NY 10002

22 (212) 277-4000

xiaoxi.tu@freshfields.com

23 elizabeth.curran@freshfields.com

24 ALSO PRESENT: Tyler Crotty - Videographer

25 Chelsea Gilchrist - Concierge Tech

UNDER PROTECTIVE ORDER

Page 30

1 scheme, there was no need to do an independent Montana
2 investigation on top of that, which the multi-state
3 had already done.

4 Q Does Montana have any Montana-specific
5 evidence that would support its claims in this case?

6 MR. BARNES: Object to the form.

7 A I'm going to rely on the fact that expert
8 and fact discovery is still ongoing and I will await
9 their opinions.

10 Q So you are not aware of any Montana-specific
11 evidence that would support the claims in this case
12 today?

13 MR. BARNES: Object to the form.

14 A As I said, we are waiting on our fact
15 discovery close, as well as our expert opinions and
16 since it is still ongoing, that is what I am going to
17 rely on, which is not yet ripe.

18 Q Okay, but sitting here today, you are not
19 aware of any Montana-specific evidence that would
20 support the claims in this case?

21 MR. BARNES: Object to the form.

22 A As it was a national scheme, it affected
23 Montanans in the same way that it affected all other
24 plaintiffs in this litigation. And it did affect
25 Montana persons, and so that is a specific harm to the

UNDER PROTECTIVE ORDER

Page 31

1 State of Montana.

2 Q So you're not aware of any Montana-specific
3 evidence that would support the claims in this case?

4 MR. BARNES: Object to the form.

5 A The evidence is the same as all of the
6 evidence that the other plaintiffs are alleging that
7 we designated Mr. Gordon to testify about, as it was a
8 national scheme.

9 Q So then that evidence is not
10 Montana-specific?

11 A It is Montana-specific in that it was a
12 national scheme, and the nature of the national scheme
13 affects Montana and Montanans.

14 Q Are you aware of any facts that are unique
15 to Montana that support the claims in the complaint?

16 A At this time expert and fact discovery is
17 still ongoing and we will rely on our experts'
18 opinions.

19 Q So at this time you are not aware of any
20 evidence unique to Montana that support the claims in
21 the complaint?

22 A At this time we are relying on the national
23 scheme, as I spoke to earlier, that the harms done on
24 the national scheme to all plaintiffs were also done
25 to Montana.

UNDER PROTECTIVE ORDER

Page 32

1 If there are unique harms to Montana that is
2 beyond that, I am going to await our expert and fact
3 discovery to close.

4 Q Do you know what the fact discovery deadline
5 is in this case?

6 A I do not offhand.

7 Q Okay, it is May 3rd. Is Montana going to
8 get Montana-unique evidence in the next two days?

9 MR. BARNES: Object to the form.

10 A I can't answer what's going to happen in the
11 future, sitting here today.

12 Q So sitting here today, you're not aware of
13 any Montana-unique evidence that supports the claims
14 in the complaint?

15 A I'm again going to rely on that it was a
16 national scheme that affected Montana. At this time,
17 with fact and expert discovery ongoing, am I aware
18 right now of any unique harms that were targeted
19 Montana for? At this time sitting here, I am not,
20 because it was a national scheme.

21 Q Montana is also bringing a Deceptive Trade
22 Practices Act claim in this case, right?

23 A Yes.

24 Q Is the evidence that Montana is relying on
25 for its Deceptive Trade Practice Act claim the same as

UNDER PROTECTIVE ORDER

Page 84

CERTIFICATE OF OATH

I, Alice J. Teslicko, RMR, a Notary Public
for the State of Florida at large, do hereby
certify that the witness, Anna Schneider,
appeared personally before me and was duly sworn.

Signed and sealed this 2nd day of May, 2024.



Alice J. Teslicko, RMR

Commission No. HH300672

My Commission Expires:

December 14, 2026

UNDER PROTECTIVE ORDER

Page 85

CERTIFICATE

STATE OF FLORIDA)
) ss.
COUNTY OF NASSAU)

I, ALICE TESLICKO, RMR, a Registered Merit Reporter and Notary Public for the State of Florida at Large, do hereby certify that I reported the deposition of Anna Schneider, a witness called by the Defendant in the above-styled cause; and that the foregoing pages constitute a true and correct transcription of my shorthand report of the deposition of said witness.

I further certify that I am not an attorney or counsel of any of the parties, nor a relative or employee of counsel connected with the action, nor financially interested in the action.

WITNESS my hand and official seal in the City of Fernandina Beach, County of Nassau, State of Florida, this 2nd day of May, 2024.



Alice J. Teslicko, RMR

My commission expires:
December 14, 2026
Commission No. HH300672